

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS SIERRA-TORO,

Defendant.

No.: 25-120 (FAB)

**MOTION FOR CAUTIONARY NOTICES ORDER**

**TO THE HONORABLE COURT:**

COMES NOW, plaintiff, the United States of America, through its undersigned attorneys, and respectfully states and prays as follows:

1. On or about March 12, 2025, the United States Attorney filed an information charging violations of 18 U.S.C. §§ 1343 and 1349 (Conspiracy to Commit Wire Fraud).
2. A forfeiture notice was included in connection with Count One of the Information, which provide that defendant shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property real, or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but not limited to, the following properties located at:
  - a. All right, title, and interest in property Located at Carr. 181, Km. 2.2, Bo. Quemados, San Lorenzo, PR 00754, together with all improvements and appurtenances (“Property 10468”); and
  - b. All right, title, and interest in 501 Calle Elisa Colberg Cond. Baldorioty Gardens Apt. 3-B, San Juan, PR 00907-2607, together with all improvements and appurtenances (“Property 21539”).

3. Under the laws of Puerto Rico, a cautionary notice may be requested by a person claiming in a lawsuit ownership to real property or the constitution, declaration, modification, or extinction of any recordable right or one who files his claim in an action that affects a title to real property. *See* 30 L.P.R.A. § 6064(1). The cautionary notice is to be entered into the Puerto Rico Property Registry.
4. A cautionary notice can only be made by order of the court handed down at the request of a legitimate party and by virtue of adequate documentation for prudent judicial discretion. *See id.* § 6065.

Accordingly, the United States of America respectfully moves the Court to enter the attached Proposed Orders directing the Property Registrar for the pertinent division of the Commonwealth of Puerto Rico Property Registry to record cautionary notices upon Property 10468 and Property 21539, giving notice that the properties are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

Respectfully submitted,

W. STEPHEN MULDROW  
United States Attorney

s/Daniel J. Olinghouse  
Daniel J. Olinghouse  
Assistant United States Attorney  
USDC-PR No. G03009  
Torre Chardón, Suite 1201  
350 Carlos Chardón Street  
San Juan, PR 00918  
(787) 766-5656  
Daniel.Olinghouse2@usdoj.gov

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused this filing to be presented to the Clerk of the court for filing and uploading to the CM/ECF system.

*s/Daniel J. Olinghouse*  
Daniel J. Olinghouse  
Assistant United States Attorney